FCC Response FCC 10-200 PS Docket No. 10-255

The need for action with Next Generation 911 technology is clear. Modernizing 9-1-1 raises complex challenges that will take not only time, but significant coordination on the national, federal, state and local levels. Regulation, coordination and funding are essential elements to the success of transitioning away from the existing 1960's legacy technology. The state of Washington is one of the most advanced 911 states in the country. On a statewide platform we are coordinating the implementation and transition to NG 911 and our biggest hurdle is protecting dedicated 911 funding from being raided by the Governor. The need for FCC oversight and regulation for our state may be very different that for that of a state that is not as technologically advanced as ours or does not have a dedicated funding source. But again even with a dedicated funding source we are faced with diversion of state funds which may create a tickle down effect by a subsequent loss of federal grant funding.

Transition from the legacy 911 network to NG911 is essential. The NG911 network will have the ability to support both voice and non-voice. The current 911 infrastructure does not have the technical capability to receive anything other than voice communications. NG 911 planning should address all technologies that access 911 equally. NG911 technologies should clearly address and identify access for individuals with disabilities; a key piece will be in the area of public education. Individuals with disabilities may very well already have advanced technology/communication means that are more suited for use and integration with NG911 technologies that the current 1960's telephony that supports the current 911 system.

Citizens with disabilities currently use both data and voice to contact PSAP's by means of either a TTY device or video relay service. As technology has advanced, wireless devices are now commonplace and inexpensive and will be the primary tool for individuals with disabilities. They will have the ability to send text, video, and data. Any device that has the ability to send these types of communications should be required to have the capability to contact 911 call centers.

Because of the inability to guarantee immediate and real time delivery of real-time text and SMS the definition of "primary" media needs to be identified at this time as that of only the voice communications link between the 911 caller and the PSAP. Real-time text/SMS, social network, email etc. would need to be identified as "secondary" media. In order for text/SMS to be considered primary media enforceable mandates must be in place to ensure real time delivery (comparable to a voice call to 911) and a delivery guarantee.

Although NG911 technology may evolve to IM or e-mail accessibility in the future they bring many issues involving viruses and security risks to the 911 systems and equipment.

IM and e-mail carry the same delivery issues as text and SMS. At this time, security concerns have been addressed and will continue to be addressed on integrating the 911 infrastructure into an IP based environment and that we should begin with a primary focus on real-time/SMS messaging as they are "call" based not internet access based.

NG 911 training requirements should be regulated at a state and local level, not at a federal level. Each PSAP has individual training and certifications for their personnel. These certifications and training address the PSAP liability for a wide range of issues from pre-arrival instructions to not creating a "special relationship". Liability definitions and interpretations may vary from state to state making it difficult to issue training mandates at a federal level. The National Emergency Number Association (NENA) and Association Public-Safety Communications Officials (APCO) are working to standardize 911 call processing procedures and protocols and certifications on a national level and should be used as a federal guideline. The NENA and APCO standards are valuable tools and should be used to help guide NG911.

In order for states and/or PSAP's to secure funding, issue RFPs, select vendors, install and accept systems in addition to any personnel training that might be needed, will take time. The complexity of 911 systems and the integration to new IP technologies will be a challenging process for the 911 industry. I would suggest a minimum of a five year window with a provision for time extension based upon demonstrated needs.

The Federal Communications Commission must work in concert with the Department of Justice, APCO, NENA, and the US Department of Transportation in the development of standards and the public education for NG911. It is imperative that standards form a platform and do not contradict one another.

The FCC needs to play a vital role in setting the framework on a national level for the transition to Next-Generation 911.